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Mr. Hooton  
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8 IN THE UNITED STATES DISTRICT COURT  
9 FOR THE EASTERN DISTRICT OF CALIFORNIA

10 UNITED STATES OF AMERICA, ) Case No. 2:21-cr-105-TLN  
11 Plaintiff, )  
12 vs. ) **STIPULATION AND ORDER TO CONTINUE**  
13 BRENT EDWARD HOOTON, ) **STATUS CONFERENCE AND EXCLUDE TIME**  
14 Defendant. )  
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IT IS HEREBY STIPULATED and agreed by and between Acting United States Attorney Phillip A. Talbert, through Assistant United States Attorney Mira Chernick, counsel for Plaintiff, and Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Brent Edward Hooton, that the status hearing currently set for October 7, 2021 at 9:30 be continued to December 2, 2021 at 9:30 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on October 7, 2021 at 9:30 a.m.
2. Mr. Hooton now moves to continue the status conference to December 2, 2021 at 9:30 a.m.
3. The government has discovered over 600 pages and various video and audio recordings to the defense.
4. The defense requires time to review the discovery; investigate and research possible

1 defenses; research potential pretrial motions; consult with Mr. Hooton; explore potential  
2 resolutions to the case; and otherwise prepare for trial.

- 3 5. Defense counsel believes that failure to grant the requested continuance would deny him  
4 the reasonable time necessary for effective preparation, taking into account the exercise  
5 of due diligence. *See* U.S.C. § 3161(h)(7)(B)(iv).
- 6 6. The government does not object to the continuance.
- 7 7. The parties jointly request the Court to find that the ends of justice served by granting the  
8 continuance outweighs the best interest of the public and Mr. Hooton in a speedy trial;  
9 and for the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act),  
10 that the time period between October 7, 2021 and December 2, 2021, inclusive, be  
11 deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A) (Local Code T4).

12 Respectfully submitted,

13 HEATHER E. WILLIAMS  
14 Federal Defender

15 Date: October 4, 2021

/s/ Hootan Baigmohammadi  
HOOTAN BAIGMOHAMMADI  
Assistant Federal Defender  
Attorneys for Defendant  
Mr. Hooton

19 Date: October 4, 2021

20 PHILLIP A. TALBERT  
United States Attorney

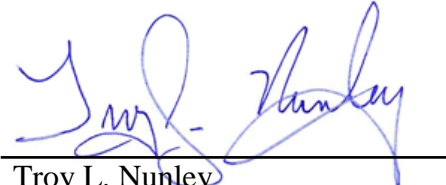
21 /s/ Mira Chernick  
Mira Chernick  
22 Assistant United States Attorney  
23 Attorneys for Plaintiff

**ORDER**

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, adopts the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: October 4, 2021

  
Troy L. Nunley  
United States District Judge